

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

ROBERT ALLEN BAUTISTA §
§
Plaintiff, §
§
v. § **Civil Action No. 3:24-cv-02593-D**
§
PRICEWATERHOUSECOOPERS LLP, §
§
Defendant. §

DEFENDANT'S REQUEST TO RESPOND TO PLAINTIFF'S MOTIONS (Dkt. 23, Dkt. 24, and Dkt. 25) BY MARCH 6, 2025

The Court granted Defendant's Unopposed Motion to Abate and Compel Arbitration on November 18, 2024 (Dkt. 8), and Defendant initiated the Arbitration Proceedings accordingly (JAMS Ref No. 5310001074). Subsequently, Plaintiff seemingly had a change of heart and filed a slew of pleadings seeking to "reopen" the case and resist arbitration (Dkts. 9–12). Defendant responded to all four filings on December 19, 2024 (Dkt. 15). Since that time, Plaintiff has continued to submit filings seeking to reopen the case and resist arbitration (Dkt. 15, 16) and filed an Amended Complaint (Dkt. 17). Defendant continues to respond (Dkt. 21, 22).

In February 2025, Plaintiff has filed two additional Motions to Amend his Complaint¹ (Dkt. 23, 24) and another pleading seeking to Abate Arbitration Proceedings and Reopen the Case alleging a JAMS violation (Dkt. 25) (collectively, "Plaintiff's Motions"). Just as before, Plaintiff has no legal basis for reopening the case and Defendant is preparing a response to Plaintiff's Motions. Defendant asks that the Court allow it to file its collective Response to Plaintiff's Motions on the latest of the response dates, March 6, 2025.

¹ Notably, Plaintiff failed to file for leave to amend his Complaint or confer with Defendant prior to filing. See N.D. Tex. Local R. 15.1(b), 7.1(h).

Respectfully submitted,

/s/ Kristin Snyder Higgins

KRISTIN SNYDER HIGGINS

Texas State Bar No. 24046880

kristin.higgins@ogletree.com

NATALIE A. DARGENE

Texas Bar No. 24144213

natalie.dargene@ogletree.com

**OGLETREE, DEAKINS, NASH, SMOAK &
STEWART, P.C.**

8117 Preston Road, Suite 500

Dallas, TX 75225

Telephone: (214) 987-3800

Fax: (214) 987-3927

ATTORNEYS FOR DEFENDANT

CERTIFICATE OF CONFERENCE

Counsel for Defendant communicated with Plaintiff on February 21, 2025, regarding the relief sought herein. Plaintiff responded on February 24, 2025 and indicated his opposition.

/s/ Kristin Snyder Higgins

Kristin S. Higgins

CERTIFICATE OF SERVICE

I hereby certify that on February 24, 2025, a true and correct copy of the foregoing document has been electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Kristin Snyder Higgins

Kristin S. Higgins